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7 *Attorneys for Defendant Citibank,*  
 N.A.

8  
 9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA

11 MARY ALBRIGHT,

12 Plaintiff,

13 v.

14 EXPERIAN INFORMATION  
 SOLUTIONS, INC.; EQUIFAX  
 15 INFORMATION SERVICES, LLC;  
 CITICARDS BANK, N.A.,

16 Defendants.  
 17

CASE NO. 2:22-cv-01271-RFB-EJY

18  
 19 UNOPPOSED MOTION AND  
~~PROPOSED ORDER TO EXTEND TIME~~  
 TO RESPOND TO COMPLAINT  
 (First Request)

20 The response of defendant Citibank, N.A. (named as “CitiCards Bank, N.A.”) is  
 21 due November 18, 2022. Citibank has requested, and Plaintiff has agreed, that  
 22 Citibank has up to and including December 2, 2022, to respond to Plaintiff’s  
 23 complaint to provide additional time for Citibank to investigate Plaintiff’s allegations  
 and for Citibank to prepare an adequate responsive pleading.

24 Although Plaintiff’s counsel consented to this extension, Citibank’s counsel  
 25 was unable to reach opposing counsel in time to authorize a stipulation and proposed  
 26 order, which is why this request is styled, instead, as an unopposed motion.  
 27 However, counsel for Citibank represents that Plaintiff’s counsel does not intend to  
 28 oppose this request. See Exhibit A, Email between Counsel (proposed settlement

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terms redacted). Citibank asserts that there is good cause under Fed. R. Civ. P. 6(b)(1) to extend this deadline, given that Citibank's counsel was recently retained and intends to discuss whether early resolution to this case is possible.

This is Citibank's first request for extension and is made in good faith and not for purposes of delay.

DATED this 18th day of November, 2022.

BALLARD SPAHR LLP

By: /s/ Andrew S. Clark

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*Attorneys for Defendant Citibank, N.A.*

**ORDER**

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: November 21, 2022